

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

SADIE HACKLER, on behalf of herself  
and all others similarly situated,

Plaintiff,

V.

TOLTECA ENTERPRISES, INC. d/b/a  
PHOENIX RECOVERY GROUP,

Defendant.

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Case No. 5:18-CV-00911-XR

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**SUPPLEMENT TO CLASS COUNSEL’S MOTION FOR ATTORNEYS FEES AND  
REIMBURSEMENT OF EXPENSES (ECF#64)**

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Bingham & Lea, P.C., and the Law Office of William Clanton (Class Counsel) file this Supplement to Class Counsel’s Motion for Attorneys Fees and Reimbursement of Expenses. Class Counsel supplements document no. 64 with the following:

**Certificate of Conference**

On June 4, 2021, counsel for both parties conferred by telephone concerning Class Counsel’s Motion for Attorneys’ Fees and Reimbursement of Expenses (ECF#64). Counsel “agreed to disagree” on an amount for a reasonable fee and expense award, because Defendant’s last offer appears to be on Defendants alleged ability to pay, without reference to the time records provided to defense counsel on multiple occasions, and not what would be a reasonable attorneys’ fee amount. Defendants last offer was about \$217 per hour.

Respectfully submitted,

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By: /s/ Benjamin R. Bingham  
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WILLIAM M. CLANTON  
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ATTORNEYS FOR PLAINTIFF

### **CERTIFICATE OF SERVICE**

I certify by my signature below that on June 11, 2021, a true and correct copy of the above and foregoing was served through the Court's Electronic Case Noticing System on all counsel of record.

/s/ Benjamin R. Bingham  
BENJAMIN R. BINGHAM